

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

IN RE MF GLOBAL HOLDINGS  
LIMITED SECURITIES LITIGATION

THIS DOCUMENT RELATES TO:

All Securities Actions  
(*DeAngelis v. Corzine*)

---

:  
:  
: Civil Action No. 1:11-CV-07866-VM  
:  
:  
:  
: ECF CASE  
:  
:

**NOTICE OF SETTLING PLAINTIFFS' MOTION  
FOR (I) PRELIMINARY APPROVAL OF THE REMAINING SENIOR  
NOTES UNDERWRITER SETTLEMENT, AND (II) APPROVAL OF  
NOTICE TO THE REMAINING SENIOR NOTES UNDERWRITER CLASS**

TO: All Counsel of Record

PLEASE TAKE NOTICE that upon the Stipulation and Agreement of Settlement with Defendants Jefferies LLC, BMO Capital Markets Corp., Natixis Securities Americas LLC, Lebenthal & Co., LLC, and U.S. Bancorp Investments, Inc. dated as of March 9, 2016 (the "Stipulation")<sup>1</sup>, attached hereto as Exhibit 1; the accompanying memorandum of law; and all other papers and proceedings herein, Lead Plaintiffs the Virginia Retirement System and Her Majesty The Queen In Right Of Alberta and named plaintiff the Government of Guam Retirement Fund (collectively, the "Settling Plaintiffs"), on behalf of themselves, the other named plaintiffs in the Action, and the other members of the Remaining Senior Notes Underwriter Class, hereby move this Court, under Rule 23 of the Federal Rules of Civil Procedure, for an order: (i) preliminarily approving the proposed Remaining Senior Notes Underwriter Settlement; (ii) approving the form and manner of giving notice to the Remaining Senior Notes Underwriter Class of the proposed Settlement and Co-Lead Counsel's motion for an award of attorneys' fees and reimbursement of expenses not previously applied for; and

---

<sup>1</sup> All capitalized terms used herein shall have the meanings provided in the Stipulation.

(iii) scheduling a hearing to consider final approval of the Settlement and approval of Co-Lead Counsel's motion for an award of attorneys' fees and reimbursement of expenses, and any other related matters. Attached hereto as Exhibit 2 is the [Proposed] Order Preliminarily Approving Proposed Settlement with Defendants Jefferies LLC, BMO Capital Markets Corp., Natixis Securities Americas LLC, Lebenthal & Co., LLC, and U.S. Bancorp Investments, Inc. and its exhibits.

Dated: March 11, 2016  
New York, New York

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**

/s/ Salvatore J. Graziano

Salvatore J. Graziano

Hannah G. Ross

Jai Chandrasekhar

1251 Avenue of the Americas, 44th Floor

New York, NY 10020

Telephone: (212) 554-1400

Facsimile: (212) 554-1444

***Co-Lead Counsel for Lead Plaintiffs,  
the Remaining Senior Notes Underwriter  
Class, and Settling Plaintiff Government of  
Guam Retirement Fund***

- and -

**BLEICHMAR FONTI & AULD LLP**

Javier Bleichmar

Dominic J. Auld

Cynthia Hanawalt

7 Times Square, 27th Floor

New York, New York 10036

Telephone: (212) 789-1340

Facsimile: (212) 205-3960

***Co-Lead Counsel for Lead Plaintiffs  
and the Remaining Senior Notes Underwriter  
Class***

#966016